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Attorneys for Non-Party  
DIGITAL DOMAIN 3.0, INC.

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

REARDEN, LLC, et al,  
Plaintiffs,

v.

WALT DISNEY PICTURES, et al.,  
Defendants.

Case No. 4:17-cv-04006-JST

**DECLARATION OF BENJAMIN M.  
KLEINMAN IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED [DKT. 428]**

Judge: Hon. Jon S. Tigar  
Ct. No.: 6 (2nd Floor)



I, Benjamin M. Kleinman, declare:

1. I am an attorney with Kilpatrick Townsend & Stockton LLP, counsel for Attorneys for non-party Digital Domain 3.0, Inc. ("DD3") in the above-captioned litigation. I make this declaration on personal knowledge and if called as a witness could and would competently testify to the matters stated herein.

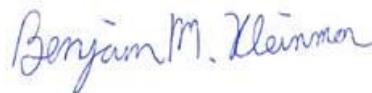
2. In connection with Plaintiffs' Motion to Exclude Portions of Expert Report and Testimony of Dr. Stephen Lane, DD3 requests the sealing of the following for the corresponding existing good cause:

Document	Good Cause for Sealing
Portions of Plaintiffs' Motion to Exclude Portions of the Expert Report and Testimony of Dr. Stephen Lane	Page 3 of the Motion to Exclude, at lines 15-19, contains information about the terms and conditions of a commercial relationship that is confidential to the parties to the relationship. Divulging that information to the general public might reasonably disadvantage the parties to and beneficiaries of that contract in future commercial negotiations.

3. DD3 has narrowly tailored its sealing request to the few lines of the motion in question, such that no further tailoring would be sufficient.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on July 14, 2023, at Novato, California.



BENJAMIN M. KLEINMAN

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